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To: HarborComments
Subject: Harbor Comments

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Submitted values are:

Your Name: (b) (6)

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Your Comments:

As a longtime Portland resident, concerned citizen and member of the local business community, I am writing to urge the EPA to take action to select the most effective cleanup plan for the Willamette River Superfund site.

Alternative G is the most reasonable alternative though some modification is required.

The EPA preferred Alternative I is woefully inadequate because:

- Alternative I proposes to leave the vast majority of contaminants untreated including PCBs, DDT, metals and dioxins that will not naturally degrade over the proposed 23 year "natural recovery" monitoring period.
- The Alternative I proposal for a confined disposal facility located within the river is dangerous and reckless. We have a history of floods and earthquakes from our Cascadia Subduction Zone. According to the City of Portland Hazard Map, the East Bank Fault runs right under Terminal 4 (the proposed CDF site) and there is a potential landslide hazard immediately behind the facility. Those potential natural disasters, coupled with the risk of leakage found in any type of containment facility, make this an especially flawed choice for placement within the river we are attempting to clean up.

This is the time to move the toxic sediment out of and away from the Willamette River.

- Alternative I does not take adequate steps to protect humans and wildlife impacted by toxins in game fish foraging along contaminated shorelines. Because those fish are then consumed by wildlife, native tribes, minority populations and other humans, this plan does not adequately reduce risks to human health and the environment.

Alternative G is the best alternative for the future health of our community.

Improvements over Alternative I include:

- Additional dredging boosts decontaminated area from 167 to 572 acres, a significant increase in the portion of the river to be restored.
- Off-site disposal rather than in-river containment of dredged materials (must choose that specific option).
- Moves further away from the "do nothing" approach of Monitored Natural Recovery.

However, the Alternative I proposal needs the following modifications:

- Must choose the option of off-site CDF.
- Needs additional work in hot-spots areas that have potential or are currently used as river access by our community.
- Elimination of capping in those unique areas that have potential or already serve as natural areas with high ecological value.

This project is our opportunity to finally remedy decades of poor ecological practices with funds supplied by the very business, corporate and governmental entities (the Potentially Responsible Parties) who prospered from the use of our riverfront while making poor environmental decisions.

Much of this pollution is historical and was often unintentional because the long term impact of the chemicals present in these contaminated sediments was unknown. We now have a better understanding and we need to use the best scientific practices to correct these decades of contamination.

I urge the EPA to reconsider and select Alternative G with the above revisions and move forward with a plan that will protect not only our citizens, but our wildlife and our environment for future generations.